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MEMBER OF THE BAR
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Concentrating in Employment, Education, and
Insurance Law

December 11, 2024

Via ECF

Honorable Orelia E. Merchant
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *Apple v. New York City Department of Education*
24-cv-04380-OEM-RML**

Dear Judge Merchant:

This office represents the Plaintiff in the above-referenced matter. Plaintiff writes this letter to respectfully request, *on consent*, an extension of time **from December 26, 2024, to January 9, 2025**, to respond to Defendant's motion to dismiss the amended complaint. Defendant's reply, if any, would be adjourned **from January 9, 2025, to January 23, 2025**. This is the first request by Plaintiff for an extension of time to respond to Defendant's Motion to Dismiss.

The reason for the extension request is that the Plaintiff's counsel has had a confluence of multiple deadlines, appearances, and depositions. These include a deposition in *Robinson vs. NYC Housing Authority*, 156979/2020; opposition papers in a Motion for a New Trial in *Leone v. Brown Foreman*, NY County Index No. 151627/2019, responses due in *Georgiadis v. Glen Cove City School District Nassau County Supreme Court* Index No. 618549/2024, *Jacobs v. Long Island University*; Westchester County Index No. 72385/2024 and numerous other deadlines. In addition, during the upcoming holidays Plaintiff's counsel was planning to take some time off.

Thank you for your consideration herein.

Very truly yours,

s/Stewart Lee Karlin

Stewart Lee Karlin, Esq.

Cc: Jordan Doll, ACC. (Via ECF)